

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

2022 DEC 22 PM 2:09

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UNITED STATES OF AMERICA)

v.)

HARLEY DAVIS)

NO. 2:22-cr-155-1

(18 U.S.C. § 922(a)(6))

INDICTMENT

The Grand Jury charges:

COUNT 1

On or about May 5, 2022, in the District of Vermont, HARLEY DAVIS, in connection with the acquisition of a Glock, model 43, 9mm semi-automatic pistol, serial number AGPF146, from Lost Nation Gun Shop, a federally licensed firearms dealer, knowingly made a false or fictitious oral or written statement intended or likely to deceive a federal firearms dealer with respect to a material fact to the lawfulness of the sale of a firearm, specifically HARLEY DAVIS stated she was the true purchaser of the firearms when in fact and as she well knew, HARLEY DAVIS was purchasing the firearm for another person and HARLEY DAVIS stated she was not a user of controlled substances when in fact and as she knew well, HARLEY DAVIS was a user of controlled substances.

(18 U.S.C. §922(a)(6))

COUNT 2

On or about May 21, 2022, in the District of Vermont, HARLEY DAVIS, in connection with the acquisition of Glock, model 42, .380 caliber semi-automatic pistol, serial number AGAX929, from Lost Nation Gun Shop, a federally licensed firearms dealer, knowingly made a false or fictitious oral or written statement intended or likely to deceive a federal firearms dealer with respect to a material fact to the lawfulness of the sale of a firearm, specifically HARLEY DAVIS stated she was the true purchaser of the firearms when in fact and as she well knew, HARLEY DAVIS was purchasing the firearm for another person and HARLEY DAVIS stated she was not a user of controlled substances when in fact and as she knew well, HARLEY DAVIS was a user of controlled substances.

(18 U.S.C. §922(a)(6))

COUNT 3

On or about May 21, 2022, in the District of Vermont, HARLEY DAVIS, in connection with the acquisition of Glock, model 42, .380 semi-automatic pistol, serial # ABCP921, from M&R Guns & Ammo, a federally licensed firearms dealer, knowingly made a false or fictitious oral or written statement intended or likely to deceive a federal firearms dealer with respect to a material fact to the lawfulness of the sale of a firearm, specifically HARLEY DAVIS stated she was the true purchaser of the firearms when in fact and as she well knew, HARLEY DAVIS was purchasing the firearm for another person and HARLEY DAVIS stated she was not a user of controlled substances when in fact and as she knew well, HARLEY DAVIS was a user of controlled substances.

(18 U.S.C. §922(a)(6))

A TRUE BILL

REDACTED

FOR PERSON

Nikolas P. Kerest (EAPC)

NIKOLAS P. KEREST (EAPC)

United States Attorney

Burlington, Vermont

December 22, 2022